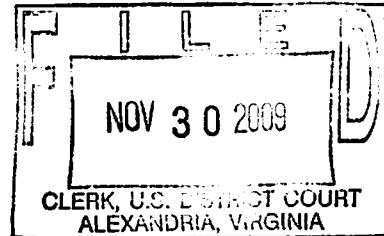


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
-ALEXANDRIA DIVISION-

ASHENDORF & ASSOCIATES LTD.
3 Fivefields Close
Watford, Herts WD19 5BZ,

MICHAEL FREEDMAN
8 Marsh Point, Marsh Road
Pinner, Middlesex HA5 5ND, and

JAYHUN REZAYEV
146 Great West Rd
Middlesex, London TW5 9AP



CIVIL ACTION NO: 1:09CV1236 - GBL/IDD

Plaintiffs,

v.

SMI HYUNDAI CORPORATION
8300 Greensboro Drive, Suite 800
McLean, VA 22102

Respondent

NOTICE OF MOTION FOR ENLARGEMENT OF TIME

PLEASE TAKE NOTICE, that the undersigned, on behalf of Respondent SMI Hyundai Corporation, will move this Court for an enlargement of time in order to respond to the Plaintiff Ashendorf & Associates LTD., *et. al.*; at the Albert V. Bryan United States District Courthouse located at 401 Courthouse Square, Alexandria, VA 22314; at _____ o'clock, on the _____ day of December, 2009, or as soon thereafter as the Respondent can be heard, for the entry of an Order enlarging the time in which the Respondent may properly respond to the Plaintiff's November 4, 2009 Complaint.

Respectfully Submitted,

November 27, 2009


For: SMI HYUNDAI CORPORATION
David Dale
President/CEO
8300 Greensboro Drive, Suite 800
McLean, VA 22102

CERTIFICATE OF SERVICE -

I hereby certify that a copy of this letter was mailed, postage prepaid, this 23rd day of November, 2009, to Andrew A. Nicely and Amanda Hine, Counsel for the Plaintiffs, at their address of record: Mayer Brown LLP, 1999 K Street NW, Washington, DC 20006.

November 27, 2009



David Dale
President/CEO
8300 Greensboro Drive, Suite 800
McLean, VA 22102